# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

LVL PATENT GROUP, LLC,	)
Plaintiff,	) )
v.	) C.A. No. 11-834-SLR
FEDERAL EXPRESS CORPORATION, et al.,	)
Defendants.	<i>)</i> )

#### NOTICE OF SUGGESTION OF BANKRUPTCY

PLEASE TAKE NOTICE that on November 29, 2011 (the "Commencement Date"), AMR Corporation, American Airlines, Inc., American Eagle Airlines, Inc., Executive Airlines, Inc., and certain of their subsidiaries and affiliates (collectively, the "Debtors") filed voluntary petitions seeking bankruptcy protection under chapter 11 of title 11 of the United States Code (11 U.S.C. § 101 et seq.) (the "Bankruptcy Code") in the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court"). The bankruptcy cases are being jointly administered under Chapter 11 Case No. 11-15463 (SHL) (the "Bankruptcy Cases"). A copy of American Airlines, Inc.'s chapter 11 petition is attached as Exhibit A.

PLEASE BE ADVISED that pursuant to section 362(a) of the Bankruptcy Code (the "Automatic Stay"), the filing of a bankruptcy petition "operates as a stay, applicable to all entities," of "the commencement or continuation, including the issuance or employment of process, of a judicial, administrative, or other action or proceeding against the debtor that was or could have been commenced before the commencement of the case under [the Bankruptcy Code], or to recover a claim against the debtor that arose before the commencement of the [bankruptcy] case" and of "any act to obtain possession of property of the estate or of property

from the estate or to exercise control over property of the estate." 11 U.S.C. §§ 362(a)(1) & 362(a)(3).

PLEASE BE FURTHER ADVISED that any action taken against the Debtors without obtaining relief from the Automatic Stay from the Bankruptcy Court may be void and may result in a finding of contempt for violation of the Automatic Stay. The Debtors reserve and retain their statutory right to seek relief in the Bankruptcy Court from any judgment, order, or ruling entered in violation of the Automatic Stay.

If the Court or any parties have questions about the Bankruptcy Cases or this notice, bankruptcy counsel for the Debtors can be contacted as follows:

Stephen A. Youngman WEIL, GOTSHAL & MANGES LLP 200 Crescent Court, Suite 300 Dallas, Texas 75201 Telephone: (214) 746-7700

Fax: (214) 746-7777

#### CONNOLLY BOVE LODGE & HUTZ LLP

OF COUNSEL:

Bradley W. Caldwell Holly E. Engelmann McKool Smith P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201

Telephone: 214.978.4000 Telecopier: 214.978.4044 <u>bcaldwell@mckoolsmith.com</u> <u>hengelmann@mckoolsmith.com</u>

Dated: December 1, 2011

/s/ Chad S.C. Stover

Chad S.C. Stover (No. 4919) The Nemours Building 1007 N. Orange Street P. O. Box 2207 Wilmington, DE 19899 (302) 658-9141 cstover@cblh.com

Attorneys for Defendant American Airlines, Inc.

### **CERTIFICATE OF SERVICE**

I, Chad Stover, hereby certify that on December 1, 2011, a true copy of the foregoing was electronically filed with the Clerk of Court using CM/ECF, which will send notification of such filings to the following counsel of record, and the document is available for viewing and downloading from CM/ECF:

I further certify that I caused copies of the forgoing document to be served on December 1, 2011, upon the following via electronic mail:

John C. Andrade

PARKOWSKI, GUERKE & SWAYZE,

116 West Water Street P.O. Box 598 Dover, DE 19903 jandrade@pgslegal.com

Bruce D. Kuyper
Fredricka Ung
Marc A. Fenster
RUSS AUGUST & KABAT
12424 Wilshire Blvd., Suite 1200
Los Angeles, CA 90025
bkuyper@raklaw.com
fung@raklaw.com
mfenster@raklaw.com

Attorneys for Plaintiff LVL Patent Group LLC Lauren Murphy Pringle

**FISH & RICHARDSON, P.C**. 222 Delaware Avenue, 17<sup>th</sup> Floor

P.O. Box 1114

Wilmington, DE 19899-1114

pringle@fr.com

Attorneys for Defendants

Federal Express Corporation and Barnes &

Noble Inc.

Jack B. Blumenfeld

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

1201 North Market Street P.O. Box 1347

Wilmington, DE 19899 <a href="mailto:jbbefiling@mnat.com">jbbefiling@mnat.com</a>

kjlefiling@mnat.com

Attorneys for Defendants

Karen Jacobs Louden

& MORRIS, NICHOLS, ARSHT & TUNNELL LLP

1201 North Market Street

P.O. Box 1347

Wilmington, DE 19899

kilefiling@mnat.com

Attorneys for Defendants

Motorola Mobility Inc. and Hilton Worldwide

United Parcel Service Inc., Verifone Inc. Systems Inc., Hypercom Corporation, US Airways Inc., AirCanada and United Airlines Inc.

Gregory Erich Stuhlman Eve H. Ormerod

## GREENBERG TRAURIG, LLP

The Nemours Building 1007 North Orange Street, Suite 1200 Wilmington, DE 19801 <u>stuhlmang@gtlaw.com</u> <u>ormerode@gtlaw.com</u>

Kimberly A. Warshawsky

### **GREENBERG TRAURIG, LLP**

2375 East Camelback Road, Suite 700 Phoenix, AZ 85016 warshawskyk@gtlaw.com

Attorneys for Defendant DHL Express (USA) Inc.

Richard L. Horwitz David E. Moore

# POTTER ANDERSON & CORROON LLP

Hercules Plaza, 6th Floor 1313 N. Market Street P.O. Box 951 Wilmington, DE 19899-0951 rhorwitz@potteranderson.com dmoore@potteranderson.com

Lawrence B. Goodwin Monica V. Bhattacharyya Stefan Stoyanov

KASOWITZ, BENSON, TORRES & FRIEDMAN, LLP

1633 Broadway
New York, NY 10019
lgoodwin@kasowitz.com
mbhattacharyya@kasowitz.com
sstoyanov@kasowitz.com

Jeffrey J. Toney

Philip A. Rovner

# POTTER ANDERSON & CORROON LLP

1313 N. Market St., Hercules Plaza, 6<sup>th</sup> Floor P.O. Box 951 Wilmington, DE 19899-0951 provner@potteranderson.com

Attorneys for Defendant First Data Corporation

John G. Day

#### **ASHBY & GEDDES**

500 Delaware Avenue, 8<sup>th</sup> Floor P.O. Box 1150 Wilmington, DE 19899 jday@ashby-geddes.com

Attorneys for Defendant JetBlue Airways Corporation Jonathan D. Olinger
Jonathan K. Waldrop

KASOWITZ PENSON

KASOWITZ, BENSON, TORRES & FRIEDMAN, LLP

1360 Peachtree Street, N.E. Suite 1150 Atlanta, GA 30309 <a href="mailto:jtoney@kasowitz.com">jtoney@kasowitz.com</a> <a href="jolinger@kasowitz.com">jolinger@kasowitz.com</a> <a href="jolinger@kasowitz.com">jwaldrop@kasowitz.com</a>

Attorneys for Defendant Delta Air Lines Inc.

Anne Shea Gaza Travis Steven Hunter

### RICHARDS, LAYTON & FINGER, PA

One Rodney Square 920 N. King Street Wilmington, DE 19801 gaza@rlf.com

Attorneys for Defendant Marriott International Inc. Denise Seastone Kraft Aleine Michelle Porterfield

#### **DLA PIPER LLP**

919 N. Market Street, Suite 1500 Wilmington, DE 19801

<u>Denise.kraft@dlapiper.com</u>

<u>Aleine.porterfield@dlapiper.com</u>

Aaron Fountain John Guaragna Brian Erickson **DLA PIPER LLP** 401 Congress Avenue Suite 2500 Austin, TX 78701-3799

Aaron.fountain@dlapiper.com John.guaragna@dlapiper.com Brian.erickson@dlapiper.com

Attorneys for Defendant Starwood Hotels & Resorts Worldwide Inc.

Gregory Brian Williams
FOX ROTHSCHILD LLP

919 North Market Street, Suite 1300 P.O. Box 2323 Wilmington, DE 19899-2323 gwilliams@foxrothschild.com

Laura Beth Miller
David P. Linder
BRINKS HOFER GILSON & LIONE
NBC Tower, Suite 3600

Richard L. Horwitz

# POTTER ANDERSON & CORROON LLP

Hercules Plaza, 6th Floor 1313 N. Market Street P.O. Box 951 Wilmington, DE 19899-0951

rhorwitz@potteranderson.com

Attorneys for Defendant Amazon.com Inc.

455 North Cityfront Plaza Drive Chicago, IL 60611 <a href="mailter@brinkshofer.com">lmiller@brinkshofer.com</a> <a href="mailter@brinkshofer.com">dlindner@brinkshofer.com</a>

Attorneys for Defendant Hyatt Hotels Corporation

Rodger Dallery Smith, II

MORRIS, NICHOLS, ARSHT &

TUNNELL LLP

1201 North Market Street

P.O. Box 1347

Wilmington, DE 19899

rsmith@mnat.com

Michael N. Rader
James J. Foster
Charles Steenburg
WOLF, GREENFIELD & SACKS, P.C.
600 Atlantic Avenue
Boston, MA 02210-2206
mrader@wolfgreenfield.com
jfoster@wolfgreenfield.com
csteenburg@wolfgreenfield.com

Attorneys for Defendant Sony Electronics Inc.

/s/ Chad S.C. Stover Chad S.C. Stover (#4919)

4563649